

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

J.K.J.,

Plaintiff,

v.

POLK COUNTY SHERIFF'S
DEPARTMENT, DARRYL L.
CHRISTENSEN,

Case No. 15-C-428

Defendant,

WISCONSIN COUNTY MUTUAL
INSURANCE CORPORATION,

Intervenor.

**POLK COUNTY SHERIFF'S DEPARTMENT'S
MOTION FOR SUMMARY JUDGMENT**

Defendant, Polk County Sheriff's Department, ("Polk County"), moves for summary judgment pursuant to Rule 56(a) of the Federal Rules of Civil Procedure on the grounds that it is entitled to judgment as a matter of law based on the material, undisputed facts of record. The grounds for this motion are set forth in the Brief in Support of Defendant Polk County Sheriff's Department's Motion for Summary Judgment, Defendant Polk County Sheriff's Department's Proposed Findings of Fact, and the Declaration of Scott Nargis, all of which are filed contemporaneously herewith.

Dated this 1st day of July, 2016.

s/ Paul D. Cranley

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